



April 3, 2020

The Honorable Chair and Commissioners  
Public Utilities Commission, State of Hawai'i  
465 South King Street  
Kekuanaoa Building, 1st Floor  
Honolulu, Hawai'i 96813

**Re: Docket No. 2019-0323 (Instituting a Proceeding to Investigate Distributed Energy Resource Policies Pertaining to the Hawaiian Electric Companies): Request for Expedited Relief during the COVID-19 Crisis.**

Aloha Chair Griffin and Commissioners Potter and Asuncion:

Distributed Energy Resources Council, Hawai'i PV Coalition, and Hawai'i Solar Energy Association (collectively, the "DER Parties") appreciate the Commission's March 24, 2020 statement acknowledging the gravity of the COVID-19 outbreak, and making clear the Commission's commitment to ensure reliable and affordable essential service, achieve Hawai'i's clean energy and climate goals, and enable the energy sector to support Hawai'i's economic recovery from this crisis.

In response to the Commission's requests for "new proposals, requests, and partnerships that can help residents and businesses better manage their utility bills," "creative proposals . . . that can support and expand clean energy job opportunities," and "new proposals and ideas . . . that can promote recovery and are ready to implement," the DER Parties respectfully request the Commission to take prompt action directing the Hawaiian Electric Companies to expedite key points of delay in their interconnection process, and to allow small DER systems to begin operation upon installation with inverter safety features activated. This step would meaningfully address and promote the Commission's three expressed priorities, as well as help the existing DER industry and its thousands of employees weather the immediate crisis.

Among its many unprecedented, sweeping impacts, COVID-19 ("coronavirus") has caused significant disruption of the local distributed solar industry, which provides thousands of jobs and energy self-sufficiency and resiliency for Hawai'i residents.<sup>1</sup> While

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<sup>1</sup> The DER Parties acknowledge the severe public health impacts caused by the coronavirus throughout Hawai'i and the world and recognize the incredible economic and

the solar industry has been recognized as an essential service that should continue, under current social distancing policies and stay-at-home orders, the industry's ability to function has been severely restricted and could come to a halt. Our initial surveys indicate that many Hawai'i solar companies have furloughed or laid off significant numbers of their employees. Nationally, the Solar Energy Industries Association estimates a nearly 55% decline in new business for the residential sector alone.<sup>2</sup>

We anticipate DER will be a critical contributor to Hawai'i's economic resilience and eventual recovery from the coronavirus disruption, creating needed jobs and economic stimulus, helping Hawai'i residents reduce the high cost of electricity, and continuing our progress and momentum toward our clean energy goals. But the existing solar industry must survive over the next six months to be able to assist with that recovery.

The Commission has the opportunity to mitigate the impact to the Hawai'i solar industry and assist with the continued deployment of clean energy statewide. The Commission can require Hawaiian Electric to expedite the interconnection process to allow customers currently in the pipeline to complete their installations and receive the benefit of lower electricity bills during this time of substantial need. Allowing these projects to be completed in the near-term will also allow existing DER companies to continue operating during this immediate crisis. In sum, expediting key points of delay in the interconnection process can serve as a "no regrets" approach to supporting essential businesses on the frontlines of Hawai'i's clean energy movement.

Specifically, the DER Parities request that the following measures be taken in an expedited timeframe:

- **Allow customers, with volt-var and volt-watt turned on, to activate systems 25 kW or smaller upon installation.** The process to get permission to operate, post-installation, can take six to eight weeks to complete. With the activation of inverter safety features such as volt-var and volt-watt, there should be little or no reason to delay activation of these systems at an earlier stage. The Commission should authorize customers to turn on all 25 kW or smaller systems where the customers voluntarily activate volt-watt, so long as the validation forms are filed in a timely manner. Hawaiian Electric can still conduct an inspection at a later date, as needed.
- **Complete energy service upgrades within two weeks of application.** Approximately 20 percent of all DER interconnection requests require an electrical service upgrade. Energy service upgrade requests in the Hawaiian Electric territories can take an average of five to six months to complete,

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personal strain being placed on all. Nothing in this letter is intended to diminish the severity of these impacts.

<sup>2</sup> See <https://www.greentechmedia.com/squared/the-lead/assessing-the-impacts-of-the-coronavirus-on-the-u.s-solar-industry>.

compared to an average completion time of one week for comparable utilities (e.g., PG&E). The Commission should require residential and small commercial applications to be completed within two weeks or, in the alternative, customers should receive a \$100 customer bill rebate per month until the service upgrade is completed.

- **Conduct meter swaps within two weeks of request.** Currently the process of replacing an existing electric meter with a new DER meter can take weeks or months. In addition to slowing down the interconnection process, meter swap delays negatively affect customers who could turn on a DER system upon installation. For example, an older meter may read energy exports incorrectly as an import and charge a customer for that production. While Hawaiian Electric could avoid such problems by starting the meter swap process earlier, at the very least, the utility should be able to complete the meter swap within two weeks after notice of a completed installation. If Hawaiian Electric fails to complete the swap within this timeframe, we propose a \$100 bill customer bill rebate for each month the meter is not swapped. Exceptions could be made where Hawaiian Electric is unable to get access to the property.
- **Allow contractors to activate a second meter socket.** Currently, only Hawaiian Electric (through its third-party meter contractor) can install a second production meter required for Customer Grid Supply+ systems. This creates an inefficient bottleneck in which a contractor must: (1) install a meter socket; (2) wait four to six weeks after install for the third party to put in the CGS+ meter; (3) wait up to another week for a net meter to be installed; and then (4) wait up to another week for the permission to operate letter to arrive. To expedite this process, the DER Parties suggest contractors be allowed to power the second meter themselves with a UL-approved device, e.g., by installing a temporary meter. Hawaiian Electric, at its convenience, can have the temporary meter removed and replaced with a permanent meter. This frees up resources and also limits person-to-person contact between Hawaiian Electric employees, DER companies, and customers.
- **Require Hawaiian Electric to implement a six-month plan to rapidly expand the interconnection process.** Other jurisdictions, such as Pacific Gas & Electric, Southern California Edison, and OUC,<sup>3</sup> allow customers to install a DER system without an initial pre-approval application process. Approval is sought and obtained post-installation, which allows customers to install a DER system in a matter of days—instead of the months or years that currently is the norm in Hawai'i. This also reduces the administrative burden on the utility. We understand a majority of Hawaiian Electric's circuits have been studied and mapped, and see no reason why a similar process could not be implemented here.

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<sup>3</sup> See <https://www.ouc.com/environment-community/ouc-solar-solutions/how-to-apply-for-your-home>.

Expediting and automating the interconnection process could save customers thousands of dollars per installation and take a critical step forward in removing inefficient and costly barriers and accelerating Hawai'i's clean energy progress.

There is precedent from other jurisdictions for these requested actions. After the 2017 hurricanes in Puerto Rico, for example, Governor Rossello signed an Executive Order (OE-2017-64) allowing companies to energize solar and storage systems without going through the utility interconnection process. We request a temporary order that would be in effect for six months, or when business in Hawai'i resumes its normal course. This allows the distributed solar industry to continue operating during a period when electricity bill savings and increased self-sufficiency and resiliency are especially needed.

In sum, the Commission should direct Hawaiian Electric to expeditiously implement steps to remediate and streamline the interconnection process, starting with actionable near-term progress, and memorializing the improvements in revisions to Tariff Rule 14H as needed. Thank you for your consideration of the DER Parties' request.

Respectfully Submitted,



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cc: all docket parties (by electronic mail)

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